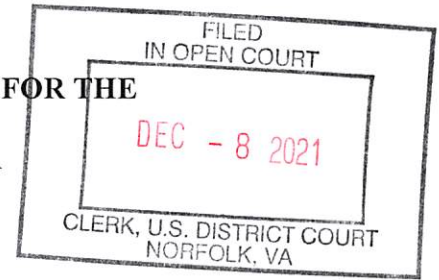


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Norfolk Division



UNITED STATES OF AMERICA

v.

JESSICA ANN BRONSON,

Defendant.

Criminal Case No. 2:21-cr-45

STATEMENT OF FACTS

The United States and the defendant, JESSICA ANN BRONSON (hereinafter, “the defendant,”) agree that at trial, the United States would have proven the following facts beyond a reasonable doubt with admissible and credible evidence:

1. From in or about May 2020 and continuing thereafter until on or about April 22, 2021, in the Eastern District of Virginia and elsewhere, the defendant did knowingly and intentionally combine, conspire, confederate and agree with other persons, both known and unknown, to knowingly and intentionally distribute and possess with intent to distribute 50 grams or more of methamphetamine, commonly known as “ice,” and 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, both Schedule II controlled substances, in violation of Title 21, United States Code, Sections 846, 841(a)(1), (b)(1)(A) and (b)(1)(B).

2. During the conspiracy, the defendant, together with her son, Tory Eugene Drain (hereinafter “Drain”), shipped methamphetamine and fentanyl through the U.S. Mail from Arizona to co-conspirators in the Eastern District of Virginia for further distribution.

Two handwritten signatures in blue ink. The one on the left is a stylized signature, possibly "J. M.". The one on the right is more legible, appearing to be "T. E. Drain".

3. On or about June 8, 2020, U.S. Postal Inspectors in Norfolk interdicted a U.S. Postal Service Priority Mail Express parcel. The defendant mailed the subject parcel from a U.S. Post Office in Glendale, Arizona on or about May 31, 2020, to a residence on Holland Drive in Virginia Beach. After a trained drug dog alerted on the subject parcel, the Court issued a search warrant for the parcel based on probable cause. A U.S. Postal Inspector opened the parcel and discovered 6.44 grams of methamphetamine inside. The U.S. Postal Service Laboratory subsequently identified fingerprints recovered from the adhesive side of the mailing tape found on this parcel as the defendant's.

4. On or about November 2, 2020, the defendant caused a U.S. Postal Service Priority Mail Express parcel containing 13.96 grams of methamphetamine with an average purity of $98 \pm 6\%$ to be mailed from a U.S. Post Office in Scottsdale, Arizona to a residence on County Street in Portsmouth. Following delivery, a concerned citizen surrendered the parcel to law enforcement.

5. On or about November 24, 2020, police in Arizona stopped the defendant on Interstate 17 near Mayer, Arizona, because the vehicle she was operating had been reported stolen. During an inventory search of the vehicle, the police seized approximately 12 grams of a substance that field tested positive for methamphetamine. The police also located paper receipts for seven (7) U.S. Postal Service Priority Mail Express parcels, all dated November 24, 2020, and time-stamped between 0406 hours and 0418 hours, mailed from an Automated Postal Center (hereinafter "APC") machine at a U.S. Post Office in Scottsdale, Arizona, and en route to various addresses in the Eastern District of Virginia. After being advised of her *Miranda* rights, the defendant admitted that two of the parcels were going to Susanne Stout's (hereinafter "Stout") residence in Virginia Beach. U.S. Postal Inspectors subsequently identified the individual mailer

of each of these seven parcels as the defendant from photographs taken by the APC machine at the time each was mailed.

6. On or about November 25, 2020, Virginia Beach Police seized two of the seven parcels during the execution of a search warrant at Stout's residence in Virginia Beach. Upon opening the two parcels, investigators discovered 108.76 grams of methamphetamine with an average purity of 95.9 ± 2.1 % in one parcel and 55.52 grams of methamphetamine with an average purity of 98.3 ± 2.1 % in the second parcel. The police detained Stout. Following *Miranda*, Stout identified her methamphetamine source as the defendant. Stout indicated the defendant had moved from Virginia Beach to Arizona. After the defendant moved to Arizona, she contacted Stout and offered to ship Stout methamphetamine from Arizona for \$500 per ounce. Stout agreed. The defendant sent Stout parcels containing as much as four (4) ounces of methamphetamine. The defendant also mailed Stout 100 pill quantities of fentanyl. The defendant charged Stout \$10 per pill. Stout used Green Dot MoneyPak and CashApp to pay the defendant for drugs. Stout distributed the methamphetamine and fentanyl from these parcels in the Eastern District of Virginia.

7. As confirmed by U.S. Postal Service records, the defendant shipped numerous drug parcels from Arizona to Stout in the Eastern District of Virginia. Stout received these drug parcels at the following locations on or about the following dates:

- a. A residence on Credle Road in Virginia Beach: June 24, 2020; July 4, 2020; July 18, 2020; and July 25, 2020; and,
- b. Stout's residence on Reuben Street in Virginia Beach: October 3, 2020; October 10, 2020; October 27, 2020; October 30, 2020; November 3, 2020; and November 6, 2020.

8. U.S. Postal Inspectors in Norfolk detained the five (5) other U.S. Postal Service Priority Mail Express parcels identified in the receipts found in the defendant's possession in Arizona on November 24, 2020. The five parcels were en route to addresses in Portsmouth, Chesapeake, Virginia Beach, and Hartfield. On December 3, 2020, following an alert by a trained drug dog on each of the parcels, the Court issued a search warrant for the five parcels based on probable cause. Next, a U.S. Postal Inspector opened each of the five parcels and discovered the following:

a. A parcel addressed to a residence on Wood Hollow Cove in Virginia Beach contained 27.79 grams of methamphetamine and 5.39 grams of fentanyl. The U.S. Postal Service Laboratory subsequently identified fingerprints recovered from the adhesive side of the mailing tape found on this parcel as the defendant's.

b. A parcel addressed to a residence on Holland Drive in Virginia Beach contained 28.32 grams of methamphetamine.

c. A parcel addressed to a residence on Shore Drive in Hartfield in Middlesex County contained 110.41 grams of methamphetamine. The U.S. Postal Service Laboratory subsequently identified fingerprints recovered from the adhesive side of the mailing tape found on this parcel as the defendant's and Drain's.

d. A parcel addressed to a residence on Elmhurst Lane in Portsmouth contained 28.22 grams of methamphetamine.

e. A parcel addressed to a residence on Laurel Avenue in Chesapeake contained 27.92 grams of methamphetamine.

Chesapeake, Middlesex County, Norfolk, Portsmouth and Virginia Beach are in the Eastern District of Virginia.

9. This statement of facts includes those facts necessary to support the plea agreement between the defendant and the United States. It does not include each and every fact known to the defendant or to the United States, and it is not intended to be a full enumeration of all of the facts surrounding the defendant's case.

10. The actions of the defendant, as recounted above, were in all respects knowing and deliberate, and were not committed by mistake, accident, or other innocent reason.

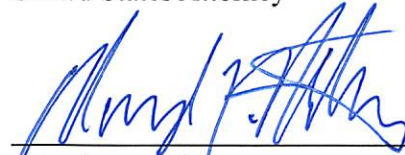
Respectfully submitted,

Jessica D. Aber
United States Attorney

Date:

12/6/21

By:


Darryl J. Mitchell
Assistant United States Attorney

After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, JESSICA ANN BRONSON, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.


JESSICA ANN BRONSON

I am Jason David Lamm, defendant's attorney. I have carefully reviewed the above Statement of Facts with her. To my knowledge, her decision to stipulate to these facts is an informed and voluntary one.


Jason David Lamm, Esq.
Attorney for JESSICA ANN BRONSON